

ORIGINAL

JUDGE WOODS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

: INFORMATION

- v. -

ROBERTO SANCHEZ

Defendant.

19¹⁸ CRM 469

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COUNT ONE

(Narcotics Conspiracy)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: JUN 21 2019

The United States Attorney charges:

1. From in or about January 2012 up to and including in or about April 2018, in the Southern District of New York and elsewhere, ROBERTO SANCHEZ, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ROBERTO SANCHEZ, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that ROBERTO SANCHEZ, the defendant, conspired to distribute and possess with intent to distribute was mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Health Care Fraud Conspiracy)

The United States Attorney further charges:

4. From in or about January 2012 up to and including in or about April 2018, in the Southern District of New York and elsewhere, ROBERTO SANCHEZ, the defendant, and others known and unknown, willfully and knowingly, combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Section 1347.

5. It was a part and an object of the conspiracy that ROBERTO SANCHEZ, the defendant, and others known and unknown, knowingly and willfully, would and did execute, and attempt to execute, a scheme and artifice to defraud a health care benefit program and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United

States Code, Section 1347, to wit, SANCHEZ obtained through fraudulent prescriptions, and purchased from others who obtained through fraudulent prescriptions, medically unnecessary oxycodone pills paid for by Medicare and Medicaid in order to resell such pills to others.

(Title 18, United States Code, Sections 1349.)

FORFEITURE ALLEGATIONS

6. As a result of committing the narcotics offense alleged in Count One of this Information, ROBERTO SANCHEZ, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

7. As a result of committing the Federal health care offense charged in Count Two of this Information, ROBERTO SANCHEZ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any and all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the

commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

8. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

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SEALED INFORMATION

18 Cr.

(21 U.S.C. § 846,
18 U.S.C. §§ 1349.)

GEOFFREY S. BERMAN
United States Attorney.
